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429 SOUTH 96TH STREET • SEATTLE, WASHINGTON 98108 • 762-0330

May 19, 1987

MAY 20 1987

Mr. Wally Swafford
Toxic & Hazardous Waste Coordinator
Seattle/King County
1510 Public Safety Building
Seattle, WA 98104

Dear Mr. Swafford,

As a result of an anonymous complaint, Ace Galvanizing was recently inspected by representatives of the N.W. Regional Office of Department of Ecology. The purpose of the inspection, in addition to verifying the veracity of the complaint, was to inspect our compliance with water quality standards.

During the course of the inspection, the inspector noted our barrelled dried sludge by-products (Iron Sulfate) and questioned the chemical content of the by-products, in addition to our disposal procedures. Heretofore, these by-products (primarily Iron Sulfate) have been tested (copies of tests attached) and found suitable for landfill disposal. Uncontaminated Iron Sulfate, constituting eighty (80%) of the by-products generated, have commercial value and are reclaimed by Nu-Life for use in fertilizer. The remaining twenty (20%) of by-products generated are contaminated with soil and disposed of in landfills.

The DOE Response Team requested that we characterize our non-commercial by-products by segregation and chemical analysis in order to determine disposal procedures in accordance with Chapters 173-303 and 304 WAC and RCW's 70.95 and 70.105. They further requested that we coordinate the tests to be performed with the Seattle/King County Health Department. They further suggested that the material be tested for heavy metals and fish toxicity. Accordingly, we have separated barrelled non-commercial by-products into three (3) categories for testing:

Category #1: Dried sludge from rinse tank in Galvanizing Process. This sludge has been de-regulated by EPA and heretofore disposed of in landfills.

Category #2: Dried sludge from Sulfuric Acid Pickling Tank; primarily Iron Sulfate, but contaminated with scale and dirt off "pickled" material.

Category #3: Dirt from excavations for concrete pad in degreasing rack-up area.

Mr. Swafford, as you are aware, we have hired Mr. Pedone, an Environmental Regulatory Consultant to assist us in correcting those areas by the DOE Response Team. Mr. Pedone will telephone you shortly to discuss this further

USEPA SF



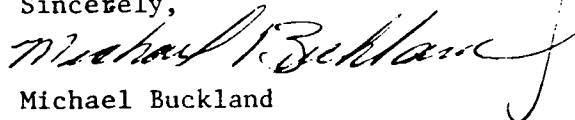
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Mr. Wally Swafford
Toxic & Hazardous Waste Coordinator - page two

and hopefully determine the extent of testing to be accomplished.

Thank you for your time and attention to this matter.

Sincerely,



Michael Buckland
General Manager

cc: N.W. Regional Response Team
Attention: Mr. Ron Devitt
Department of Ecology
4350 - 150th Avenue N.E.
Redmond, WA 98052

Elliott Bay/Duwamish Action Team (EBAT)
Department of Ecology, N.W. Regional Office
4350 - 150th Avenue N.E.
Redmond, WA 98052

MB/fb

Laucks

Testing Laboratories, Inc.

940 South Harney St., Seattle, Washington 98108 (206)767-5060



Certificate

Chemistry, Microbiology and Technical Services

CLIENT: Ace Galvanizing
429 S. 96th St.
Seattle, WA 98108
ATTN: Mike Buckland

LABORATORY NO: 97746

DATE: July 29, 1986

REPORT ON: IRON SULFATE

SAMPLE
IDENTIFICATION: Submitted 7/16/86

TESTS PERFORMED
AND RESULTS:

	<u>g</u>
Zinc	0.91
Lead	0.001
Iron	17.

Semiquantitative Spectrographic Analysis for Trace Elements

Manganese	0.052
Silicon	0.0075
Copper	0.0022
Nickel	0.0089
Cobalt	L/0.0004 (trace)
Chromium	L/0.0002 (trace)
Magnesium	0.0031
Other elements	nil

Key

L/ = less than

Respectfully submitted,

Laucks Testing Laboratories, Inc.


J.M. Owens

JMO:dr



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Certificate

Chemistry, Microbiology, and Technical Services

CLIENT: Ace Galvanizing
429 S. 96th St.
Seattle, WA 98108
ATTN: Mike Buckland

LABORATORY NO: 2136

DATE: Feb. 12, 1987

REPORT ON: IRON SULFATE

SAMPLE

IDENTIFICATION: Submitted 2/3/87 and identified as shown below:

Iron Sulfate

TESTS PERFORMED AND RESULTS:

Sample was analyzed for E.P. Toxicity in accordance with Test Methods for Evaluating Solid Wastes, (SW 846), U.S.E.P.A., July, 1982. Extraction was performed using Method 1310. Mercury and Selenium were determined using a 7000 series method; other metals performed by ICAP, Method 6010.

	<u>parts per million (mg/L)</u>	
	<u>SAMPLE</u>	<u>MCL</u>
Arsenic	L/0.2	5.0
Barium	0.1	100.
Cadmium	0.03	1.0
Chromium	L/0.1	5.0
Lead	0.1	5.0
Mercury	L/0.005	0.2
Selenium	L/0.2	1.0
Silver	L/0.1	5.0



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Chemistry, Microbiology, and Technical Services

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Ace

LABORATORY NO: 2136

Key

MCL = Maximum Contamination Level allowed per regulation.

L/ = Less than

Respectfully submitted,

Laucks Testing Laboratories, Inc.

J. M. Owens
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JMO:dr



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